

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
SOUTHERN DIVISION**

**WALTER L. NIXON**

**PLAINTIFF**

**VERSUS**

**CAUSE NO. 1:24cv363 TBM-RPM**

**HAGENS BERMAN SOBOL SHAPIRO, LLP;  
THOMAS SOBOL, Individually and  
d/b/a Hagens Berman Sobol  
Shapiro LLP and/or John and Jane Does A-C;  
and JOHN and JANE DOE A-C**

**DEFENDANTS**

**MOTION FOR RULE 41(a)(2) VOLUNTARY DISMISSAL WITH PREJUDICE**

The Plaintiff, by and through undersigned counsel, files this his Motion for Rule 41(a)(2)

Voluntary Dismissal With Prejudice, and in support thereof would show the Court as follows:

1. On November 25, 2024, Plaintiff filed his [1] Complaint against the Defendants, Hagens Berman Sobol Shapiro, LLP and Thomas Sobol, Individually and d/b/a Hagens Berman Sobol Shapiro, LLP.

2. Since the filing of his [1] Complaint, the parties have resolved the matter.

3. Plaintiff is making this stipulation prior to service of process upon any Defendants, and/or service of any Answer or responsive pleading by any Defendants.

WHEREFORE, PREMISES CONSIDERED, Plaintiff respectfully requests this Court to grant his Motion and enter an Order to dismiss Plaintiff's cause of action with prejudice pursuant to F.R.C.P. 41(a)(2), and any and all additional relief in favor of the Plaintiff deemed appropriate by this Honorable Court.

Respectfully submitted, this the 20<sup>th</sup> day of December, 2024.

Walter L. Nixon, Plaintiff

By: /s/ Christopher C. Van Cleave  
CHRISTOPHER C. VAN CLEAVE  
Attorney for Plaintiff

COUNSEL FOR PLAINTIFFS:

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